

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

3V, INC., a Delaware Corporation,)	
)	
Plaintiff)	
)	C.A. No. 06-00593-JJF
v.)	
)	
CIBA SPECIALTY CHEMICALS)	
CORPORATION, a Delaware Corporation,)	
)	
Defendant.)	
_____)	

REPLY TO COUNTERCLAIM

COMES NOW the Plaintiff, 3V, Inc. ("3V"), by counsel, and for its Reply to the Counterclaim filed by CIBA Specialty Chemicals Corporation ("CIBA"), hereby answers each numbered paragraph of the Counterclaim with respectively numbered paragraphs as follows:

FIRST DEFENSE

The Counterclaim filed by CIBA is barred and precluded by limitations and/or lack of jurisdiction by failure to timely file the claims noted in the Counterclaim.

SECOND DEFENSE

19. Denied.

20. That it admits the averments in the first sentence, but denies the remaining averments of paragraph 20 of the Counterclaim.

21. That excluding item C, it denies all remaining averments in the Prayer for relief and denies all averments not heretofore specifically admitted.

WHEREFORE, the Plaintiff and Counterclaim Defendant 3V, Inc. respectfully requests that the Court enter a judgment dismissing the Counterclaim with prejudice and awarding 3V, Inc. its costs and attorneys' fees incurred in connection with this litigation, and any other relief which the Court deems appropriate.

Dated: October 31, 2006

STEVENS & LEE, P.C.

By: /s/ Joseph Grey
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CERTIFICATE OF SERVICE

I, Joseph Grey, hereby certify that, on this 31st day of October, 2006, and in addition to the service provided by the Court's MC/ECF system, I caused true and correct copies of the foregoing Reply to Counterclaim to be served on the Defendant by first class, United States mail, postage prepaid and addressed as follows:

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/s/ Joseph Grey
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